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**From:** Davis, Kable [Davis.Kable@epa.gov]  
**Sent:** 9/17/2019 5:28:30 PM  
**To:** Goodis, Michael [Goodis.Michael@epa.gov]  
**CC:** Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]  
**Subject:** RE: March AAPCO 2020 Conference: Draft FIFRA Section 24(c) Guidance Document Update?

It actually was a really good talk. The states (or maybe just Rose...not sure) were under the impression that we were putting out for comment the guidance document, which had the potential to affect all aspects of all 24(c) registrations. I explained that we are focusing only on the ones that are more restrictive than the section 3. I also reminded her that they would have an opportunity to comment. She seemed fine at the end of the conversation.

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**From:** Goodis, Michael <Goodis.Michael@epa.gov>  
**Sent:** Tuesday, September 17, 2019 1:25 PM  
**To:** Davis, Kable <Davis.Kable@epa.gov>  
**Cc:** Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>  
**Subject:** RE: March AAPCO 2020 Conference: Draft FIFRA Section 24(c) Guidance Document Update?

Bo

Just going through my emails – what came out of the talk?

Michael L. Goodis, P.E.  
Director, Registration Division (RD)  
Office of Pesticide Programs (OPP)

Phone 703-308-8157  
Room S7623

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**From:** Davis, Kable <Davis.Kable@epa.gov>  
**Sent:** Friday, September 13, 2019 9:37 AM  
**To:** Rose Kachadoorian <rkachadoorian@oda.state.or.us>  
**Cc:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>  
**Subject:** RE: March AAPCO 2020 Conference: Draft FIFRA Section 24(c) Guidance Document Update?

Sounds like a plan. Thanks.

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Kable Bo Davis; Branch Chief  
Minor Use & Emergency Response Branch  
(703) 306-0415  
[davis.kable@epa.gov](mailto:davis.kable@epa.gov)

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**From:** Rose Kachadoorian <rkachadoorian@oda.state.or.us>  
**Sent:** Friday, September 13, 2019 9:36 AM  
**To:** Davis, Kable <Davis.Kable@epa.gov>  
**Cc:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>  
**Subject:** Re: March AAPCO 2020 Conference: Draft FIFRA Section 24(c) Guidance Document Update?

I was at a PREP Course giving a presentation for Dale Mitchell who was ill. But I will be in the office on Friday.

I will give you a call.

Rose  
(503) 986-4651

On Sep 13, 2019, at 6:01 AM, Davis, Kable <[Davis.Kable@epa.gov](mailto:Davis.Kable@epa.gov)> wrote:

Hi Rose –

I'm free now, if you have time. Would you like for me to give you a call?

Hope all is well.  
Bo

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Kable Bo Davis; Branch Chief  
Minor Use & Emergency Response Branch  
(703) 306-0415  
[davis.kable@epa.gov](mailto:davis.kable@epa.gov)

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**From:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Sent:** Friday, September 13, 2019 9:00 AM  
**To:** Rose Kachadoorian <[rkachadoorian@oda.state.or.us](mailto:rkachadoorian@oda.state.or.us)>  
**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Davis, Kable <[Davis.Kable@epa.gov](mailto:Davis.Kable@epa.gov)>  
**Subject:** Re: March AAPCO 2020 Conference: Draft FIFRA Section 24(c) Guidance Document Update?

Rose—

Thanks for your note. I'd encourage you to reach out to Mike Goodis and Bo Davis. They would be in a better position to know about the progress of this effort.

I hope all is well.

—Rick

Rick Keigwin  
Director, Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: 703-305-7090  
Website: [www.epa.gov/pesticides](http://www.epa.gov/pesticides)  
Sent from my iPhone

On Sep 11, 2019, at 12:58 PM, Rose Kachadoorian <[rkachadoorian@oda.state.or.us](mailto:rkachadoorian@oda.state.or.us)> wrote:

Hi Rick,

I hope that all is going relatively well.

As you may recall for the March 2019 AAPCO Conference, AAPCO wanted EPA to provide an update on the progress associated with EPA's review of the Draft FIFRA Section 24(c) Guidance Document. But because of the shut-down, there was a delay in the review.

Will EPA be prepared to provide an update in March 2020? If so, will this be an extensive update (requiring a separate time slot) or will you perhaps include it in your presentation?

I do not want EPA to feel rushed into making premature decisions, we can wait until the March 2021 Conference.

<https://aapco.org/2015/06/30/fifra-section-24c/> (the Draft Guidance and other documents can be found on this page)

Thank you as always,

Rose Kachadoorian  
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Pesticides Program Manager,  
Registration, Licensing and Certification  
Natural Resource Policy Area  
Oregon Department of Agriculture  
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A civilization flourishes when people plant trees under whose shade they never will sit.  
- Greek Proverb